

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ZACHARIAH ROBERTSON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

ENBRIDGE (US) INC,

Defendant.

Civil Action No. 2:19-cv-01080-WSS-LPL

Judge William S. Stickman IV

Magistrate Judge Lisa Pupo Lenihan

CYPRESS ENVIRONMENTAL MANAGEMENT-TIR, LLC'S MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24(a) and 24(b), Cypress Environmental Management-TIR, LLC ("CEM-TIR") moves to intervene in *Robertson v. Enbridge (US) Inc.*, Civil Action No. 2:19-cv-01080-WSS-LPL. For the reasons set forth in its accompanying memorandum, CEM-TIR respectfully requests that this Court grant its Motion to Intervene and add CEM-TIR as a party defendant in this case.

Respectfully submitted,

Cypress Environmental Management-TIR,
LLC

January 30, 2020

/s/ Ryan O. Hemminger

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed and served on all counsel of record via the Court's electronic filing system on January 30, 2020.

/s/ Ryan O. Hemminger
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